

ORIGINAL



0000094062

RECEIVED

1 Andrew J. Capestro
2 Far West Water and Sewer, Inc.
3 13157 E. 44th Street
4 Yuma, Arizona 85367
5 (928) 342-3344

2009 FEB 25 P 12:10

AZ CORP COMMISSION
DOCKET CONTROL

6 **BEFORE THE ARIZONA CORPORATION COMMISSION**

7 IN THE MATTER OF THE
8 APPLICATION OF FAR WEST WATER
9 & SEWER, INC., AN ARIZONA
10 CORPORATION, FOR AUTHORITY (1)
11 TO ISSUE EVIDENCE OF
12 INDEBTEDNESS IN AN AMOUNT NOT
13 TO EXCEED \$25,215,000 IN
14 CONNECTION WITH (A) THE
CONSTRUCTION OF SEWER SYSTEM
INFRASTRUCTURE IMPROVEMENTS
AND (B) REPAYMENT AND
CONSOLIDATION OF EXISTING DEBT;
AND (2) TO ENCUMBER ITS REAL
PROPERTY AND PLANT AS SECURITY
FOR SUCH INDEBTEDNESS.

DOCKET NO. WS-03478A-05-0801

**NOTICE OF FILING
PROOF OF ADOSH
CONSULTATION**

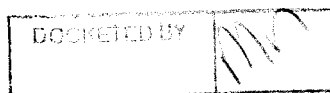
15 Pursuant to Decision No. 69335, Far West Water & Sewer, Inc. hereby files this
16 Notice of Filing Proof of Consultation with the Arizona Division of Occupational Safety
17 and Health, by filing a copy of the Consultation Report for Far West Water and Sewer
18 submitted by Consultation, Education & Training, ADOSH, dated February 13, 2009.

19 Dated this 23rd day of February, 2009.

21 Arizona Corporation Commission

22 **DOCKETED**

23 FEB 25 2009



Far West Water and Sewer, Inc.

24 By

25 Andrew J. Capestro
26

1 ORIGINAL and 13 copies mailed this
2 24th day of February, 2009 to:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 COPY mailed this 24th day of February, 2009 to:

8 Compliance Section
9 Arizona Corporation Commission
10 1200 West Washington Street
11 Phoenix, Arizona 85007

12 Legal Division
13 Arizona Corporation Commission
14 1200 West Washington
15 Phoenix, AZ 85007

16 By: Lora L. Whelan
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22
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25
26

THE INDUSTRIAL COMMISSION OF ARIZONA

DIVISION OF OCCUPATIONAL SAFETY AND HEALTH
P. O. BOX 19070
PHOENIX, AZ 85005-9070



BRIAN C. DELFS, CHAIRMAN
JOE GOSIGER, VICE CHAIRMAN
LOUIS W. LUJANO, SR., MEMBER
MARCIA WEEKS, MEMBER
JOHN C. MCCARTHY, JR., MEMBER

DARIN PERKINS, ADOSH DIRECTOR
(602) 542-5795
FAX (602) 542-1614

LAURA L. MCGRORY, DIRECTOR
TERESA HILTON, SECRETARY

February 13, 2009

Ms. Susie Ginn
Safety Coordinator
Far West Water and Sewer - Water Treatment Plant
13157 E 44th Street
Yuma, AZ 85367

Dear Ms. Ginn:

In response to your request, Steven Weberman conducted a Full Service Health survey at your **Water Treatment facility** located at **12510 S. Foothills Blvd, Yuma, AZ** on **01/29/2009**. The enclosed report details the findings of the survey. **We are pleased to inform you that no hazards were identified at this location.** The report includes recommendations regarding management practices to ensure ongoing, systematic hazard prevention. The report may also contain recommendations regarding analysis of your company's injury and illness records and steps you may consider utilizing to reduce your company's incidence of work-related injuries and illnesses.

Also enclosed is a survey form. ADOSH is constantly striving to improve our consultation services and we would appreciate receiving feedback from you regarding the services you received. Please return the form as soon as possible.

We look forward to hearing from you about steps you may have taken, or plan to take, in response to this report and the recommendations it presents. This information will help us to assist you in providing a safe and healthful workplace for your employees. It can also provide us with information about the effectiveness of our consultation effort, allowing us to emphasize its value to the fullest.

We encourage you to inform your employees of the actions you take regarding health and safety. This knowledge will help them to do their part in maintaining a safe and healthful workplace, and it will inform them of your concern for their protection.

Thank you for seeking our assistance. If you need any additional information or assistance, please contact our office.

Sincerely,

Babak Emami,
CET Supervisor
Phoenix ADOSH Office

CONSULTATION REPORT

for

**Far West Water and Sewer - Water Treatment Plant
13157 E 44th Street
Yuma, AZ 85367**

Site Address:

**12510 S. Foothills Blvd.
Yuma, AZ 85367**

Submitted By:

**Consultation, Education & Training, ADOSH
P. O. Box 19070
800 W. Washington Street, Room 207
Phoenix, AZ 85005-9070**

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Executive Summary

Introduction

This report provides the results of Full Service Health survey. When referring to this report, please reference the Visit Number **504966185**.

Summary of the Visit

ADOSH State Industrial Hygiene Consultant, Steven Weberman met with Ms. Susie Ginn, Safety Coordinator for Far West Water & Sewer to discuss the purpose and scope of the survey.

The employer is in the business of providing water and sewer services to their local community on a fee basis. The employer's SIC number's are 4941 and 4952, the NAICS equivalent numbers are 221310 and 221320 respectively. The employer's TRC and DART rates for 2007 are **8.0 for your TRC rate and 2.7 for your DART rate**. The National Average for your industry in regards to the TRC rate is 2.9 and the DART rate is 1.5. The 2007 Far West Water & Sewer rates are both above the National Average. These rates are informational only, these rates are an indicator of where Far West Water & Sewer need to be at or below in the future. This can be accomplished by reducing injuries and especially lost work time and/or days restricted.

I reviewed the employers written safety and health programs including Hazard Communication, Confined Space Entry, Respiratory Protection, Personal Protective Equipment, Hearing Conservation, Blood-borne Pathogens Exposure Control Plan, etc. All programs meet with their respective standard requirements. I recommend that you add the Personal Protective Equipment section to the Blood-borne Pathogens Exposure Control Plan.

A walk through of the facility was conducted and there were no items noted. There were no apparent violation of the OSHA standards at this facility. Housekeeping practices are at a high level meaning that the facility is extremely clean and well maintained.

I do recommend that the ear muffs near the "Blowers" be placed in a protective bag or container to keep them clean at all times when not in use.

A cordial closing was held with Ms. Susie Ginn to discuss the findings and recommendations of the survey.

Safety and Health Program Management

It was a pleasure to assist Ms. Ginn. The employer is physically doing what is required by their programs.

Management Commitment: The employer has a written safety and health program that is reviewed at least annually. The employer has expressed commitment to safety and health for their employees by establishing on the job safety and health rules and by mandating compliance by all levels of management and worker alike.

Supervisory and Management Training: All supervisors and management attend formal and informal training concerning job duties as well as safety and health guidelines for their industry. They not only attend all classes required for line staff but also pursue more extensive guidelines for the given subject.

Employee/Worker Training: All employees are provided with initial and annual refresher training for all hazards associated with their duties.

Inspection Process: The employer conducts random and routine inspections for all locations by management and employees. Document all findings for follow up procedures.

Follow up Procedures: The employer includes: inspection documentation, maintenance orders, documentation of corrective action taken and a review with findings from upper management.

Disciplinary Process: The employer has a disciplinary action plan that includes verbal and written warnings as well as termination where necessary.

Supplemental Programs: The employer has a process in place of reviewing/revising existing programs such as Respirator Protection Program, Hazard Communication, Bloodborne Pathogens, and Confined Spaces programs.

Employee Involvement: All employees do get involved and provide recommendations and complaints through and open door policy.

Safety and Health Hazards Found

Although no hazards were found during the survey, a brief explanation of the types of hazards that might be found is provided for your information.

Hazards could be in any of the following categories:

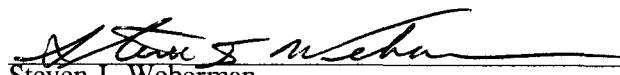
IMMINENT DANGERS - are hazards that can reasonably be expected to cause death or serious physical harm immediately or before this written report is received. Any such hazards would have been corrected immediately, and no correction dates or space for correction method would appear in a Report of Hazards Found.

SERIOUS HAZARDS - can cause an accident or health hazard exposure resulting in death or serious physical harm. Each such hazard would be assigned a mutually agreed-upon date by which correction is to be completed.

NONSERIOUS HAZARDS - lack the potential for causing serious physical harm, but could have a direct impact on employee safety and health. We encourage you to correct these hazards and notify us of the action taken.

REGULATORY HAZARDS - reflect violations of the Arizona Division of Occupational Safety and Health (ADOSH) posting requirements, recordkeeping requirements, and reporting requirements as found in A.A.C. R20-5-609, 29 CFR 1903 and 29 CFR 1904. No correction dates have been set, but we request notification of their correction.

In the event of an ADOSH compliance inspection, it is important to remember that the Compliance Officer is not legally bound by the consultant's advice or by the consultant's failure to point out a specific hazard. You may, but are not required to, furnish a copy of this report to the Compliance Officer, who may use it to determine your good faith efforts toward safety and health and reduce any proposed penalties. You are, however, required to furnish any employee exposure data from this report as required by 29 CFR 1910.1020.


Steven I. Weberman,
State Industrial Hygiene Consultant
ADOSH-CET

Attachments

A - Safety and Health Program Management

The following are the basic elements of an effective employee safety and health program.

- A. **MANAGEMENT LEADERSHIP AND EMPLOYEE INVOLVEMENT** assigns safety and health responsibility and authority to supervisors and employees and holds them accountable. It includes policy formulation; program review; and encouragement of employee involvement.
- B. **WORKSITE ANALYSIS** identifies current and potential hazards. It includes a thorough baseline survey to review work processes and individual potential hazards; management of change (to deal with facilities; equipment; and the physical, economic and regulatory environment); job hazard analysis (written safe operating procedures for major tasks); a self-inspection program, using checklists to determine whether facilities and equipment are hazardous, and pairing inspectors to facilitate employee training and participation and to increase the possibility that new observers will find overlooked conditions; a system for reporting hazards; accident and incident investigation; and analysis of injuries and illnesses.
- C. **HAZARD PREVENTION AND CONTROL.** Prevention consists of regular maintenance and housekeeping; emergency planning and preparation; first aid; ready access to emergency care; when required, medical surveillance; and, at the employer's option preventive healthcare (e.g., group health insurance, smoking cessation, and wellness programs). Control includes guards, enclosures, locks, protective equipment, safe work procedures (the result of job hazard analysis), and administrative placement of personnel so as to minimize hazards.
- D. **TRAINING** of all personnel, from managers through supervisors to employees, about the hazards they may be exposed to, and their identification, prevention, and control. Managers and supervisors also need training in program management (e.g., enforcing rules, conducting drills). Training can demonstrate management leadership and facilitate employee involvement.

In assessing program effectiveness, a consultant looks first at written materials (e.g., statement of purpose, goals and objectives, emergency plan) for clarity, completeness, and currency, then for evidence that the written materials have been effectively implemented.

Safety and Health Program Management, with Employee Involvement

A safe and healthful workplace depends on effective management, to involve line workers, supervisors and managers in ensuring that hazards are identified and that effective physical and administrative protections are established and maintained.

During this visit, your safety and health program was evaluated.

The following observations page may help you avoid the recurrence of the hazards and other findings noted during the survey, and prevent the occurrence of other hazards.

Management Leadership and Employee Involvement

- A. State clearly a worksite policy on safe and healthful work and working conditions, so that all personnel with responsibility at and for the site understands the priority of safety and health protection in relation to other organizational values.
- B. Establish and communicate a goal for the safety and health program and objectives for meeting that goal, so that all members of the organization understand the results desired and the measures planned for achieving them. Goals should be clear, measurable, and achievable within a short term. If a goal cannot be achieved within a year, it should be divisible into annual or shorter objectives.
- C. Provide visible top management leadership in implementing the program and ensure that all workers at the site, including contract workers, are provided equally high quality safety and health protection, so that all will understand that management's commitment is serious.
- D. Ensure that top managers lead by example in obeying all safety rules and engaging in safe practices, written or not, such as wearing proper equipment when and where necessary, not operating equipment on which their training is not current, not using defective equipment, and maintaining good housekeeping.

- E. Provide for and encourage employee involvement in the structure and operation of the program and in decisions that affect their safety and health, so that they will commit their insight and energy to achieving the safety and health program's goal and objectives.
- F. Assign and communicate responsibility for all aspects of the program, so that managers, supervisors, and employees in all parts of the organization know what performance is expected of them.
- G. Provide adequate authority and resources to responsible parties, so that assigned responsibilities can be met.
- H. Hold managers, supervisors, and employees accountable for meeting their safety and health program responsibilities in the same manner as meeting production schedules, so that essential tasks will be performed safely.
- I. Review program operations at least annually to evaluate their success in meeting the goal and objectives, so that deficiencies can be identified and the program and/or the objectives can be revised when they do not meet the goal.

Worksite Analysis to Identify Hazards and Potential Hazards

- A. Conduct full service worksite surveys to determine baseline conditions, so as to be able to document improvements in hazard reduction. Survey each machine, process, and work area onsite. Surveys at a minimum should be made by competent persons, and at optimum by teams of competent and affected persons. Categorize hazards as to type (chemical, electromagnetic, mechanical, or biological), frequency (during normal operation, during maintenance, or in emergencies), and severity (on a scale from life-threatening down to nuisance), given a priority for reduction or maintenance in check, and assigned to a limited service supervisor or manager for such reduction or maintenance (risk management).

Where severity equals OSHA's definitions of imminent danger or serious hazard, responsible and affected employees should work together to find a way or ways to reduce the hazard within a limited service short time span long enough only to allow for measurements, procurement, and installation, and should consider interim protective measures when such normal delays allow significant exposure.

Take advantage of the wide variety of sources for appropriate protective measures: manufacturers' recommendations, industry and union journals, local trade shows, industry standards, National Institute for Occupational Safety and Health (NIOSH) and OSHA documents, and library and other database document searches based on key words. Review these sources as necessary to take advantage of new or newly feasible hazard control technology.

Update the full service site survey in whole or in part whenever new control methods become feasible or when an unplanned change in conditions occurs.

- B. Analyze planned and new facilities, processes, materials, and equipment, to determine whether they present any new hazards or change exposure to current hazards, and their effects on emergency planning and employee training.
- C. Perform routine hazard analysis of jobs and processes, whether regular, maintenance, or emergency. Base the order in which analyses are performed upon priorities determined as part of your baseline full service survey.
- D. Provide for regular site safety and health inspections, so that new, recurring, or previously missed hazards and failures in hazard controls are identified. Frequency and particulars or inspection will vary with equipment and physical plant component, due to manufacturers' recommendations, standard operations, or maintenance schedules, but should be planned for each machine, process, and work area onsite. Inspections at a minimum should be made by competent persons, and an optimum should be made by teams of competent and affected persons. Inspection outcomes should be certifications of the safety of equipment and certifications or revisions of standard operating procedures.

There should be standard procedures for assigning and tracking defective equipment to repair or replacement and for assigning responsibility for and tracking the improvement of standard operating procedures.

- E. So that employee insight and experience in safety and health protection may be used and employee concerns addressed, provide a reliable system for employees, without fear of reprisal, to notify

management personnel about conditions that appear hazardous and to receive timely and appropriate responses. Encourage the employees to use the system, through recognition or other incentives.

- F. Provide for investigation of accidents and "near miss" incidents, so that their causes and contributing factors, and the means for their prevention, are identified.
- G. Analyze injury and illness trends over time, so that patterns with common causes and contributing factors can be identified and prevented.

Hazard Correction And Control

- A. So that all current and potential hazards, however detected, are eliminated or controlled in a timely manner, establish procedures for that purpose, using the following measures:
 - 1. Engineering techniques where feasible and appropriate.
 - 2. Procedures for safe work which are understood and followed by all affected parties, as a result of training, positive reinforcement, correction of unsafe performance, and, if necessary, enforcement through a clearly communicated disciplinary system.
 - 3. Provision of personal protective equipment.
 - 4. Administrative controls, such as reducing the duration of exposure.
- B. Provide for facility and equipment maintenance, so that the facility is kept clean and safe and equipment is kept in good and safe operating condition. Establish maintenance responsibilities, schedules and, on a priority based on the procedural hazards, written procedures.

Ensure that there are written procedures for all maintenance that involves hazardous waste, such as disposal of expired batteries, used solvents, or old paint. You should check with local authorities for any regulations that may apply to such tasks.
- C. Plan and prepare for emergencies, and conduct training drills as needed, so that the response of all parties to emergencies will be "second nature." Contact your local fire department for information on participation in local disaster drills.
- D. Establish a medical program which uses occupational health professionals to assist in the analysis of hazards, to help design or certify as accurate your training materials on recognition and treatment of illness and injury, and to provide or supervise required medical tests and examinations.
- E. Provide first aid and cardiopulmonary resuscitation (CPR) onsite and physician and emergency medical care nearby, so that harm will be minimized if an injury or illness does occur.

Safety and Health Training

- A. Ensure that all employees understand the hazards to which they may be exposed, how to recognize those hazards, and how to prevent harm to themselves and others from exposure to these hazards, so that employees accept and follow established safety and health protections.
- B. Ensure that supervisors understand their safety and health responsibilities and the reasons for them, including:
 - 1. Analyzing the work under their supervision to identify unrecognized potential hazards.
 - 2. Maintaining physical protections in their work areas.
 - 3. Reinforcing employee training on the nature of potential hazards in their work and on needed measures, through continual performance feedback and, if necessary, through enforcement of safe work practices.
- C. Ensure that managers understand their need to demonstrate leadership and commitment to employee safety and health, by word and by deed.

CONSULTATION EVALUATION FORM

Name: _____

Company: _____

Name of Consultant: _____

Date of Survey: _____

1. **What is your opinion of the usefulness of the consultation service?**

Very useful _____ Useful _____ Not useful _____

Comments:

2. **Was the ADOSH consultant knowledgeable and helpful?**

Yes _____ No _____

Comments:

3. **What changes, if any, should be made to this service?**

4. **How did you become aware of the consultation service?**

_____ Used it before
_____ Friend/acquaintance
_____ Seminar

_____ Compliance inspection
_____ Training class
_____ other (specify _____)

THE INDUSTRIAL COMMISSION OF ARIZONA

DIVISION OF OCCUPATIONAL SAFETY AND HEALTH
P. O. BOX 19070
PHOENIX, AZ 85005-9070



BRIAN C. DELFS, CHAIRMAN
JOE GOSIGER, VICE CHAIRMAN
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MARCIA WEEKS, MEMBER
JOHN C. MCCARTHY, JR., MEMBER

DARIN PERKINS, ADOSH DIRECTOR
(602) 542-5795
FAX (602) 542-1614

LAURA L. MCGRORY, DIRECTOR
TERESA HILTON, SECRETARY

February 13, 2009

Ms. Susie Ginn
Safety Coordinator
Far West Water and Sewer - Seasons WWTP
13157 E 44th Street
Yuma, AZ 85367

Dear Ms. Ginn:

In response to your request, Steven Weberman conducted a Full Service Health survey at your **Waste Water Treatment Plant** located at **County 10th Street and Fall Street (Seasons) facility** on **01/29/2009**. The enclosed report details the findings of the survey. **We are pleased to inform you that no hazards were identified at this location.** The report includes recommendations regarding management practices to ensure ongoing, systematic hazard prevention. The report may also contain recommendations regarding analysis of your company's injury and illness records and steps you may consider utilizing to reduce your company's incidence of work-related injuries and illnesses.

Also enclosed is a survey form. ADOSH is constantly striving to improve our consultation services and we would appreciate receiving feedback from you regarding the services you received. Please return the form as soon as possible.

We look forward to hearing from you about steps you may have taken, or plan to take, in response to this report and the recommendations it presents. This information will help us to assist you in providing a safe and healthful workplace for your employees. It can also provide us with information about the effectiveness of our consultation effort, allowing us to emphasize its value to the fullest.

We encourage you to inform your employees of the actions you take regarding health and safety. This knowledge will help them to do their part in maintaining a safe and healthful workplace, and it will inform them of your concern for their protection.

Thank you for seeking our assistance. If you need any additional information or assistance, please contact our office.

Sincerely,

Babak Emami,
CET Supervisor
Phoenix ADOSH Office

CONSULTATION REPORT

for

**Far West Water and Sewer - Seasons WWTP
13157 E 44th Street
Yuma, AZ 85367**

**Site Address: County 10th Street & Fall Street
Yuma, AZ 85367**

Submitted By:

**Consultation, Education & Training, ADOSH
P. O. Box 19070
800 W. Washington Street, Room 207
Phoenix, AZ 85005-9070**

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Executive Summary

Introduction

This report provides the results of Full Service Health survey. When referring to this report, please reference the Visit Number **504966193**.

Summary of the Visit

ADOSH State Industrial Hygiene Consultant, Steven Weberman met with Ms. Susie Ginn, Safety Coordinator for Far West Water & Sewer to discuss the purpose and scope of the survey.

The employer is in the business of providing water and sewer services to their local community on a fee basis. The employer's SIC number's are 4941 and 4952, the NAICS equivalent numbers are 221310 and 221320 respectively. The employer's TRC and DART rates for 2007 are **8.0 for your TRC rate and 2.7 for your DART rate**. The National Average for your industry in regards to the TRC rate is 2.9 and the DART rate is 1.5. The 2007 Far West Water & Sewer rates are both above the National Average. These rates are informational only, these rates are an indicator of where Far West Water & Sewer need to be at or below in the future. This can be accomplished by reducing injuries and especially lost work time and/or days restricted.

Your 2008 TRC and DART rates, even though they are not required at this time as of January 29, 2009, are 0.0 for both rates. Congratulations on that accomplishment, good job!

I reviewed the employers written safety and health programs including Hazard Communication, Confined Space Entry, Respiratory Protection, Personal Protective Equipment, Hearing Conservation, Blood-borne Pathogens Exposure Control Plan, etc. All programs meet with their respective standard requirements. I recommend that you add the Personal Protective Equipment section to the Blood-borne Pathogens Exposure Control Plan.

A walk through of the facility was conducted and there were no items noted. There were no apparent violation of the OSHA standards at this facility. Housekeeping practices are at a high level meaning that the facility is extremely clean and well maintained.

Recommendations:

1. There was some new lubricating oil in a gas can, I recommend that the oil be placed in a container other than a gas can and ensure that the new oil container be labeled.
2. There was a "Flammables" sign on the outside door of a room that used to store flammables and now the room does not have and may never have flammable storage. I recommend that the "Flammables" sign be removed.
3. Out at the "SOMAT" unit there is a cord & plug which is plugged into an outside electrical outlet with the protective cover open while the cord is active. I recommend a different cover that is able to be completely closed when the cord is plugged into the outlet.

A cordial closing was held with Ms. Susie Ginn to discuss the findings and recommendations of the survey.

Safety and Health Program Management

It was a pleasure to assist Ms. Ginn. The employer is physically doing what is required by their programs.

Management Commitment: The employer has a written safety and health program that is reviewed at least annually. The employer has expressed commitment to safety and health for their employees by establishing on the job safety and health rules and by mandating compliance by all levels of management and worker alike.

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Safety and Health Hazards Found

Although no hazards were found during the survey, a brief explanation of the types of hazards that might be found is provided for your information.

Hazards could be in any of the following categories:

IMMINENT DANGERS - are hazards that can reasonably be expected to cause death or serious physical harm immediately or before this written report is received. Any such hazards would have been corrected immediately, and no correction dates or space for correction method would appear in a Report of Hazards Found.


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determine your good faith efforts toward safety and health and reduce any proposed penalties. You are, however, required to furnish any employee exposure data from this report as required by 29 CFR 1910.1020.



Steven I. Weberman,
State Industrial Hygiene Consultant
ADOSH-CET

Attachments

A - Safety and Health Program Management

The following are the basic elements of an effective employee safety and health program.

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Safety and Health Program Management, with Employee Involvement

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During this visit, your safety and health program was evaluated.

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- B. Establish and communicate a goal for the safety and health program and objectives for meeting that goal, so that all members of the organization understand the results desired and the measures planned for achieving them. Goals should be clear, measurable, and achievable within a short term. If a goal cannot be achieved within a year, it should be divisible into annual or shorter objectives.
- C. Provide visible top management leadership in implementing the program and ensure that all workers at the site, including contract workers, are provided equally high quality safety and health protection, so that all will understand that management's commitment is serious.
- D. Ensure that top managers lead by example in obeying all safety rules and engaging in safe practices, written or not, such as wearing proper equipment when and where necessary, not operating equipment on which their training is not current, not using defective equipment, and maintaining good housekeeping.

- E. Provide for and encourage employee involvement in the structure and operation of the program and in decisions that affect their safety and health, so that they will commit their insight and energy to achieving the safety and health program's goal and objectives.
- F. Assign and communicate responsibility for all aspects of the program, so that managers, supervisors, and employees in all parts of the organization know what performance is expected of them.
- G. Provide adequate authority and resources to responsible parties, so that assigned responsibilities can be met.
- H. Hold managers, supervisors, and employees accountable for meeting their safety and health program responsibilities in the same manner as meeting production schedules, so that essential tasks will be performed safely.
- I. Review program operations at least annually to evaluate their success in meeting the goal and objectives, so that deficiencies can be identified and the program and/or the objectives can be revised when they do not meet the goal.

Worksite Analysis to Identify Hazards and Potential Hazards

- A. Conduct full service worksite surveys to determine baseline conditions, so as to be able to document improvements in hazard reduction. Survey each machine, process, and work area onsite. Surveys at a minimum should be made by competent persons, and at optimum by teams of competent and affected persons. Categorize hazards as to type (chemical, electromagnetic, mechanical, or biological), frequency (during normal operation, during maintenance, or in emergencies), and severity (on a scale from life-threatening down to nuisance), given a priority for reduction or maintenance in check, and assigned to a limited service supervisor or manager for such reduction or maintenance (risk management).

Where severity equals OSHA's definitions of imminent danger or serious hazard, responsible and affected employees should work together to find a way or ways to reduce the hazard within a limited service short time span long enough only to allow for measurements, procurement, and installation, and should consider interim protective measures when such normal delays allow significant exposure.

Take advantage of the wide variety of sources for appropriate protective measures: manufacturers' recommendations, industry and union journals, local trade shows, industry standards, National Institute for Occupational Safety and Health (NIOSH) and OSHA documents, and library and other database document searches based on key words. Review these sources as necessary to take advantage of new or newly feasible hazard control technology.

Update the full service site survey in whole or in part whenever new control methods become feasible or when an unplanned change in conditions occurs.

- B. Analyze planned and new facilities, processes, materials, and equipment, to determine whether they present any new hazards or change exposure to current hazards, and their effects on emergency planning and employee training.
- C. Perform routine hazard analysis of jobs and processes, whether regular, maintenance, or emergency. Base the order in which analyses are performed upon priorities determined as part of your baseline full service survey.
- D. Provide for regular site safety and health inspections, so that new, recurring, or previously missed hazards and failures in hazard controls are identified. Frequency and particulars or inspection will vary with equipment and physical plant component, due to manufacturers' recommendations, standard operations, or maintenance schedules, but should be planned for each machine, process, and work area onsite. Inspections at a minimum should be made by competent persons, and an optimum should be made by teams of competent and affected persons. Inspection outcomes should be certifications of the safety of equipment and certifications or revisions of standard operating procedures.

There should be standard procedures for assigning and tracking defective equipment to repair or replacement and for assigning responsibility for and tracking the improvement of standard operating procedures.

- E. So that employee insight and experience in safety and health protection may be used and employee concerns addressed, provide a reliable system for employees, without fear of reprisal, to notify

management personnel about conditions that appear hazardous and to receive timely and appropriate responses. Encourage the employees to use the system, through recognition or other incentives.

- F. Provide for investigation of accidents and "near miss" incidents, so that their causes and contributing factors, and the means for their prevention, are identified.
- G. Analyze injury and illness trends over time, so that patterns with common causes and contributing factors can be identified and prevented.

Hazard Correction And Control

- A. So that all current and potential hazards, however detected, are eliminated or controlled in a timely manner, establish procedures for that purpose, using the following measures:
 - 1. Engineering techniques where feasible and appropriate.
 - 2. Procedures for safe work which are understood and followed by all affected parties, as a result of training, positive reinforcement, correction of unsafe performance, and, if necessary, enforcement through a clearly communicated disciplinary system.
 - 3. Provision of personal protective equipment.
 - 4. Administrative controls, such as reducing the duration of exposure.
- B. Provide for facility and equipment maintenance, so that the facility is kept clean and safe and equipment is kept in good and safe operating condition. Establish maintenance responsibilities, schedules and, on a priority based on the procedural hazards, written procedures.

Ensure that there are written procedures for all maintenance that involves hazardous waste, such as disposal of expired batteries, used solvents, or old paint. You should check with local authorities for any regulations that may apply to such tasks.
- C. Plan and prepare for emergencies, and conduct training drills as needed, so that the response of all parties to emergencies will be "second nature." Contact your local fire department for information on participation in local disaster drills.
- D. Establish a medical program which uses occupational health professionals to assist in the analysis of hazards, to help design or certify as accurate your training materials on recognition and treatment of illness and injury, and to provide or supervise required medical tests and examinations.
- E. Provide first aid and cardiopulmonary resuscitation (CPR) onsite and physician and emergency medical care nearby, so that harm will be minimized if an injury or illness does occur.

Safety and Health Training

- A. Ensure that all employees understand the hazards to which they may be exposed, how to recognize those hazards, and how to prevent harm to themselves and others from exposure to these hazards, so that employees accept and follow established safety and health protections.
- B. Ensure that supervisors understand their safety and health responsibilities and the reasons for them, including:
 - 1. Analyzing the work under their supervision to identify unrecognized potential hazards.
 - 2. Maintaining physical protections in their work areas.
 - 3. Reinforcing employee training on the nature of potential hazards in their work and on needed measures, through continual performance feedback and, if necessary, through enforcement of safe work practices.
- C. Ensure that managers understand their need to demonstrate leadership and commitment to employee safety and health, by word and by deed.

CONSULTATION EVALUATION FORM

Name: _____

Company: _____

Name of Consultant: _____

Date of Survey: _____

1. **What is your opinion of the usefulness of the consultation service?**

Very useful _____ Useful _____ Not useful _____

Comments:

2. **Was the ADOSH consultant knowledgeable and helpful?**

Yes _____ No _____

Comments:

3. **What changes, if any, should be made to this service?**

4. **How did you become aware of the consultation service?**

_____ Used it before
_____ Friend/acquaintance
_____ Seminar

_____ Compliance inspection
_____ Training class
_____ other (specify _____)